

### **REMARKS/ARGUMENTS**

This amendment is submitted along with a request for a three month extension, a Petition for Revival and appropriate fees in reply to the Office Action dated July 13, 2006. Claims 1-17 and 19-55 currently stand rejected and are the only claims pending in the present application.

The present application went abandoned for failure to respond to the Office Action of July 13, 2006. However, Applicants respectfully submit that the delay in responding to the Office Action was unavoidable due to the unexpected death of Applicant's agent listed at the correspondence address provided in connection with the present application. Applicants attempted to file papers changing the correspondence address, but the currently outstanding Office Action was issued before Applicants papers were filed and thus, the Office Action of July 13, 2006 was not received by Applicants' attorneys. Accordingly, Applicants respectfully request revival of the present application in accordance with the Petition for Revival provided herewith.

In light of the remarks presented below, Applicants respectfully request reconsideration and allowance of all now-pending claims of the present application.

#### **Claim Rejections - 35 USC §103**

Claims 1-3, 9-11, 14-17, 19, 20, 22-25, 29, 30, 34-47 and 49-55 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Adams et al. (U.S. Patent No. 6,457,030, hereinafter "Adams") in view of Wang et al. (U.S. Patent No. 6,822,663, hereinafter "Wang"). Claims 4-8, 12, 13, 21, 26-28, 31-33 and 48 stand rejected as being obvious over Adams and Wang and further in view of various combinations of Raghunandan (U.S. Patent No. 6,775,689), Kanevsky (U.S. Patent No. 6,300,947) and the article Wei-Ying Ma et al., *A Framework for Adaptive Content Delivery in Heterogeneous Network Environments*, presented at Multimedia Computing and Networking (MMCN00), San Jose, California, USA, 2000 (hereinafter "Ma").

Independent claim 1 recites, *inter alia*, analyzing the serial data of the electronic document by at least one transformation module to determine an order of presentation of the portions of the content different from the order defined by the serial data.

Adams is directed to modifying web content files for display at devices with small displays. The Office Action alleges that the above recited feature is disclosed by Adams by virtue of the disclosure of FIG. 1. In this regard, the Office Action states that the steps outlined in FIG. 1B of Adams would have strongly suggested that reordering of content takes place. However, the disclosure of Adams clearly describes only the replacement of elements with alternative elements and not the reordering of any elements. In this regard, Adams provides discussion of modifications to content for display at numerous locations (e.g., col. 7, lines 48-52 and col. 8, lines 5-12). FIG. 1A of Adams also illustrates steps which include a step of modifying elements for display at step (600). However, FIG. 1B, which describes step (600) in greater detail, clarifies that the modification includes replacing elements with alternative elements identified within a retrieved content modification file (see step (602)). FIGS. 4A-4C further describe "various aspects of replacing elements within an HTML file with alternative elements" (col. 8, lines 45-46). Indeed Adams is replete with discussions of replacing existing elements with alternative elements within a retrieved content modification file and never mentions reordering any elements. Accordingly, Applicants respectfully submit that the modifications of Adams clearly relate to replacement of elements and not reordering of elements as provided in the claimed invention.

It should be noted that Adams describes the use of priority values in modification decisions. However, even with regard to priority values, the assigned priorities are used to determine whether to reformat an element or whether to ignore the element altogether (col. 8, lines 36-40 and FIG. 1B, step (604)) and not used for reordering elements. As such, not only does Adams fail to teach or suggest that serial data representing an electronic document is analyzed to determine a different order of presentation for the serial data than the order received as recited in the claimed invention, but Adams makes it clear that the modifications disclosed refer to replacement and not reordering of elements. Given the explicit explanation in FIG. 1 itself regarding what is meant by modification of elements in Adams, Applicants respectfully submit that one of skill in the art would not perceive any suggestion to reorder content based on the disclosure of Adams. Furthermore, given the clarity Adams provides on the subject, one of skill in the art would not be motivated to modify Adams to meet the claimed invention. To the

contrary, the clarity with which Adams describes modification of elements in the form of replacing original elements with alternative elements teaches away from the reordering described in the claimed invention. Accordingly, Adams fails to teach or suggest analyzing the serial data of the electronic document by at least one transformation module to determine an order of presentation of the portions of the content different from the order defined by the serial data as recited in independent claim 1.

Wang, Raghunandan, Kanevsky and Ma also fail to teach or suggest the above recited feature and are not cited as such. Since each of the cited references individually fails to teach or suggest the above recited feature, any combination of the cited references also fails to teach or suggest analyzing the serial data of the electronic document by at least one transformation module to determine an order of presentation of the portions of the content different from the order defined by the serial data as recited in independent claim 1. Accordingly independent claim 1 is patentable over the cited references taken either individually or in combination.

Applicants further submit that independent claims 36, 38, 41, 42 and 53 recite similar subject matter to that of independent claim 1 with respect to the feature described above. Accordingly, Applicants submit that the independent claims 36, 38, 41, 42 and 53 are patentable for at least those reasons given above for independent claim 1. Claims 2-17, 19-35, 37, 39, 40, 43-52, 54 and 55 each depend either directly or indirectly from corresponding ones of independent claims 1, 36, 38, 41, 42 and 53 and thus include all the recitations of their corresponding independent claims. Therefore, dependent claims 2-17, 19-35, 37, 39, 40, 43-52, 54 and 55 are patentable for at least those reasons given above for independent claims 1, 36, 38, 41, 42 and 53.

Accordingly, Applicants respectfully submit that the rejections of claims 1-17 and 19-55 are overcome.

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### **CONCLUSION**

In view of the remarks presented above, Applicants respectfully submit that the present application is in condition for allowance. As such, the issuance of a Notice of Allowance is therefore respectfully requested. In order to expedite the examination of the present application, the Examiner is encouraged to contact Applicants' undersigned attorney in order to resolve any remaining issues.

It is not believed that extensions of time or fees for net addition of claims are required, beyond those that may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 CFR § 1.136(a), and any fee required therefore (including fees for net addition of claims) is hereby authorized to be charged to Deposit Account No. 16-0605.

Respectfully submitted,



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